

1 Lawrence K. Engel
2 Attorney at Law
3 40 Lake Bellevue #100
4 Bellevue, WA 98009
5 (425) 454-5500

Hon. Christopher M. Alston
Chapter 11/Seattle
Hrg. Date: August 24, 2018 @ 9:30 am
Resp. Date: **August 17, 2018**

6 **UNITED STATES BANKRUPTCY COURT**
7 **FOR THE WESTERN DISTRICT OF WASHINGTON**
8 **AT SEATTLE**

8 In re:
9 NORTHWEST TERRITORIAL MINT,
10 LLC
11 325 E. Washington St. #226
12 Sequim, WA 98382,
13
14 Debtor.

Case No. 16-11767-CMA

NOTICE OF HEARING COMBINED
WITH MOTION TO WITHDRAW AS
COUNSEL FOR CREDITOR

14 **NOTICE OF HEARING**

15 PLEASE TAKE NOTICE that a Hearing on Lawrence K. Engel's Motion to Withdraw as
16 Counsel for the Chris A. Trivelas, Creditor, IS SET as follows:

17 JUDGE: Christopher M. Alston

TIME : 9:30 a.m.

18 PLACE: U.S. Courthouse
19 700 Stewart St., Room 7206
20 Seattle, WA 98101

DATE: August 24, 2018

21 The relief sought is described specifically in the subjoined Motion. This Notice is combined with
22 the Motion described above as authorized by Local Rules.

23 **MOTION TO WITHDRAW AS COUNSEL FOR CREDITOR**

24 COMES NOW Lawrence K. Engel, Counsel for Chris A. Trivelas, Creditor, and makes the
25 following Motion to Withdraw in the above entitled case as per G.R. 2 of the Local Rules of the

NOTICE OF HEARING COMBINED WITH MOTION
TO WITHDRAW AS COUNSEL FOR CREDITOR - 1

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U.S. District Court (incorporated into the Local Rules of the above-entitled Court by reference) as follows:

1. Mr. Engel has appeared in the above-entitled case for Chris A. Trivelas, Creditor, for monitoring purposes from May 11, 2016 to present. Mr. Trivelas filed his own Proof of Claim in the amount of \$151,880 at Claim No. 1980 on May 18, 2016. All administration of the above-entitled case has been going smoothly under the Trustee's able hand since the time of filing. There will be little or no further meaningful work for the Mr. Trivelas' counsel to do in this case, which is approaching resolution.

2. Mr. Engel seeks to withdraw as counsel for the Mr. Trivelas herein since he has scheduled a planned retirement for the end of the calendar year 2018. Mr. Engel also has experienced some significant health issues in the end of 2017 and early 2018, that require his attention at this time.

3. Based on the foregoing, there is good cause shown to authorize Mr. Engel's withdrawal as counsel for Chris A. Trivelas, in the above-entitled case. The last known address for the Mr. Trivelas is that listed on the Claim No. 1980: **P.O. Box 725, North Bend, WA 98045-0725**

WHEREFORE, Mr. Engel respectfully requests that the Court grant relief on the above Motion to Withdraw as requested. This Motion is verified by the subjoined Declaration of Lawrence K. Engel.

IF YOU OPPOSE the subjoined Motion to Withdraw and/or any of the relief specified above, you must file your written response with the Clerk of the U.S. Bankruptcy Court, U.S. Courthouse, 700 Stewart St., Room 6301, Seattle, WA 98101-1271, serve two copies on the Judge's Chambers, and serve one copy on the undersigned Lawrence K. Engel, Counsel for the moving party, 40 Lake Bellevue #100, Bellevue, WA 98005 NOT LATER THAN the RESPONSE DATE, which is **August 17, 2018.**

IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion, GRANT THE MOTION PRIOR TO THE HEARING, WITHOUT FURTHER NOTICE, and strike the hearing.

NOTICE OF HEARING COMBINED WITH MOTION
TO WITHDRAW AS COUNSEL FOR CREDITOR - 2

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1 DATED: July 17, 2018.

2 /s/ Lawrence K. Engel
3 LAWRENCE K. ENGEL, WSBA #8421
4 Withdrawing Counsel for Chris A. Trivelas, Creditor

5 **DECLARATION**

6 I, LAWRENCE K. ENGEL, declare that the following is true and correct under penalty
7 of perjury, and pursuant to 28 U.S.C. § 1746:

8 1. I am counsel for the Chris A. Trivelas in the above entitled Chapter 11 case and am
9 making this Declaration in support of the subjoined Motion. I have personal knowledge of all facts
10 attested to herein, and am competent to testify to same.

11 2. I have read the subjoined Motion to Withdraw, and believe that all factual statements
12 contained therein are true and correct, under penalty of perjury, and hereby adopt same as my
13 testimony herein.

14 I certify that the foregoing testimony is true and correct to the best of my knowledge and
15 belief under penalty of perjury.

16 DATED at Mount Vernon, Washington this 17th day of July, 2018.

17 /s/ Lawrence K. Engel
18 Lawrence K. Engel, WSBA # 8421
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